Remarks

The Applicant has amended various of the claims as described below, cancelled Claim 2 and added new Claims 11-16, also described below.

Claim 1 has been amended to recite the step of defining a virtual address of a destination station and comprising a plurality of time-related sequences. Support may be found on Page 5, Lines 1-2 and Claim 6. Claim 1 has also been amended to recite that the sequences are predetermined ordered sequences. Also, Claim 1 now includes the affirmative step of storing time-related communication parameters in a memory at each failure and/or success in establishing communication. Support may be found in the Applicant's Specification at Page 4, Lines 21-23, Page 5, Lines 1-2, Claim 2 and Claim 6. Finally, Claim 1 has been amended to recite processing the data stored in the memory by correlating at least one variable factor with failure and/or success in establishing communications with the real addresses. Support may be found at Pages 5-6, Lines 24-26 of the Applicant's Specification.

Claim 2 has been cancelled and Claims 3, 5, and 6 have been amended to change the dependency to Claim 1.

Claim 7 has been amended to recite means for sequentially calling a destination station from an ordered time-related list of addressees. Again, support may be found in the Applicant's Specification at Page 5, Lines 1-2 and Claim 6. Claim 7 has also been amended to recite means for the storage in the memory of a history of past communication sequences comprising time-related communication parameters. Support is the same as above. Finally, Claim 7 has been amended to recite that the means for modeling processing time-related communications parameters stored in memory to model the optimal sequences. Support may be found on Pages 5 and 6 at Lines 24-26 of

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the Applicant's Specification.

Claim 10 has been amended in a manner that is similar to that of Claim 7.

New Claims 11-16 have been added. Claim 11 recites that establishing a communications channel is performed by selectively choosing an outgoing telecommunications network. Support may be found on Pages 3 and 4, Lines 23-24 of the Applicant's Specification. New Claim 12 recites that the selective choices performed according to a least cost routing process. Support is the same as set forth above with respect to Claim 11.

Claim 13 recites that determining a new order of the sequences performed at each call. Support may be found at Page 5, Lines 9-11 of the Applicant's Specification.

Claim 14 recites that sequential searching is performed automatically. Claim 15 recites that sequential searching is performed semi-automatically in a way that an operator provides an extra service. Finally, Claim 16 recites that the extra service is one selected from the group consisting of interpretation of a party's request, searching for supplying information, scheduling appointments and interactive filtering. Support for all of Claims 14-16 may be found in the Applicant's Specification at Page 4, Lines 5-13. Consideration on the merits is respectfully requested.

The Applicant notes the rejection of Claims 1-10 under 35 U.S.C. §103 over the hypothetical combination of Holt with Gross. The Applicant also notes with appreciation the Examiner's helpful comments and the theoretical application of Holt and Gross to the claims. The Applicant nonetheless respectfully submits that even if one skilled in the art were to make the hypothetical combination, the resulting processes would still fail to teach or suggest the subject matter of the solicited claims. Detailed reasons are set forth below.

The Applicant agrees that Gross discloses the first three elements of Claim 1, namely

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defining a virtual address, sequentially searching and transferring data. However, Gross fails to disclose the last three elements of Claim 1, namely (1) at each failure and/or success in establishing communication, communication parameters are stored in a memory, the communication parameters being time-related, (2) correlating at least one variable factor with failure and/or success in establishing communications with the real addresses, the at least one variable factor being time related, and (3) determining a new order of the sequence for sequentially searching through the real addresses based on the correlation.

Holt also discloses determining a new order of the sequence for sequentially searching through the real addresses. However, Holt also does not disclose two of the three above-mentioned elements.

Hence, neither Gross nor Holt discloses time-related communication parameters stored in memory. At best, Holt discloses storing a probability indicator for each destination and an update of this indicator at each call (Col. 7, Lines 27-38). Holt only discloses a counter that is increased at each failure or success in establishing communication. No communication parameter is stored in the memory. No time-related (for example time, date of the call) parameter is stored.

Gross also does not disclose the step of storing communication parameters as indicated in the rejection. Such storing of time-related communication parameters and the determination of a new order of the sequence based on the correlation with these stored data provide more flexibility in constituting the time-related call sequences.

Indeed, Gross provides a Followme routing constituted of one or more routing schedules, each including one or more terminating numbers (i.e. real addresses). These routing schedules are specified by the subscriber (Col. 9, Lines 65-66) and remain unchanged unless the subscriber

modifies them.

If the Holt teachings are hypothetically applied to the Gross Followme routing solution, the result is automatic updating routing schedules based upon date, day and/or time (Gross, Col. 10, Line 1). Since Holt only stores a probability indicator, the call sequences of the routing schedules evolve independently of each other from the original sequence specified by the subscriber.

If the subscriber modifies the routing schedule (e.g. modifying the time of each routing schedule), a great number of new calls for updating a new indicator associated with the new schedule is needed for the solution based upon Gross and Holt to achieve an efficient call sequence. In sharp contrast, the claims rely on the presence of the history of communication parameters stored in memory to quickly process (by the neural network) a new efficient sequence regarding the new schedule without needing new calls. It thus becomes clear that storing the communication parameters provides a great advantage over Gross and Holt.

Neither Gross nor Holt discloses storing time-related communication parameters on which is based the correlation for updating call sequences of a virtual address. In sharp contrast, the solicited claims store these parameters at each failure and/or success in establishing communication. They then provide a more flexible system to update efficiently call sequences whether or not the time related to the sequences (i.e. schedule) is modified.

The result of the complete failure of both of Gross and Holt to disclose processing data stored in the memory by correlating at least one variable factor with failure and/or success in establishing communications with the real addresses and storing time-related communication parameters in a memory at each failure and/or success in establishing communications means that even if one skilled in the art were to hypothetically combine the teachings of Holt with Gross, the resulting process

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would still fail to teach or suggest the subject matter of all of solicited Claims 1-10. The Applicant therefore respectfully requests that the rejection be withdrawn.

There are further differences with respect to various of the dependent claims including Claims 4, 6, 11, 12, 15, and 16. Details of those differences are set forth below.

With respect to Claim 4, Gross discloses static sequences (Findme or Followme routing) whose use is a function of a user's choice (Col. 9, Line 25 and Col. 12, Lines 43-59). However, Gross fails to disclose the iterative process of updating the call sequence and an expert system ("a neural network") to either switch from one routing to the other or update the sequences.

Holt discloses a probability counter on which the call sequence is reordered. However, the sorting can be a sorting algorithm (Col. 7, Line 59), a descending or ascending order according to the value of the counters (Col. 7, Line 51; Col. 8, Line 9).

Neither Holt nor Gross process complex data (e.g. communication parameters stored in memory). They do not need or disclose expert systems, as the neural network, to process these data. Claim 4 is specially adapted to process complex data to estimate the call partner's habits. As a consequence, Claim 4 is not disclosed and is not obvious in view of Gross or Holt, taken individually or collectively.

With respect to Claim 6, Gross does not save any communication parameters in memory as explained above. Holt only stores an incremental or probability indicator, which differs from the time or hour parameters of the calls. In sharp contrast, Claim 6 stores time or hour parameters in memory on which is based the correlation processing. As explained above, the use of such parameters provides more flexibility in schedule routing as efficient call sequences can be quickly generated based on stored data when the schedules are modified. As a consequence, Claim 6 is not

disclosed and is not obvious in view of Gross or Holt, whether taken individually or collectively.

With respect to Claim 11, it particularly recites a selective choice of an outgoing telecommunications network. This provides a way to save costs. In contrast, neither Holt nor Gross deals with the access and choice of the telecommunications network used to establish communication. Therefore, the hypothetical combination is inapplicable to Claim 11.

With respect to Claim 12, neither Gross nor Holt mention the use of a least cost routing process, providing a cost saving comparing to the usual solution. Thus, both of Gross and Holt do not apply to Claim 12.

With respect to Claims 15 and 16, an operator intervention is claimed to offer intermediate services to the users. In Gross, the system is automatic except for the initial definition of call sequences and the choice between Followme or Findme routing, these steps being processed by the user. Gross does not disclose the presence of an operator in the system. Holt discloses a totally automatic system in which an initial configuration can require the user's intervention (definition of the call numbers). Thus, it is clear that neither Gross nor Holt discloses the subject matter of Claims 15 and 16. As a consequence, hypothetically combining Holt with Gross would still fail to teach or suggest the subject matter of Claims 15 and 16.

The Applicant therefore respectfully submits that Claims 4 and 6 are allowable over the hypothetical combination as set forth in the rejection. The Applicant also respectfully submits that Claims 11 and 12 and 15-16 are also allowable for the reasons set forth above.

In light of the foregoing, the Applicant respectfully submits that the entire application is now in condition for allowance, which is respectfully requested.

Respectfully submitted,

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